



State of Utah

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M104710010
cc: April

June 25, 2013

Stuart L. Green, Senior Vice President
American Gilsonite
Bonanza Minesite
29950 South Bonanza Highway
Bonanza, Utah 84008

RE: Landfill Inspection

Dear Mr. Green:

Representatives of the Division of Solid and Hazardous Waste inspected the closed American Gilsonite-Bonanza landfill on June 13, 2013. The cooperation and help of Leah Phillips of your staff was appreciated. Due to the cap of the closed landfill being several hundred feet below the surface elevation and due to the dangerous nature of the open mine trench, an inspection was not performed. The inspection report is enclosed.

Since the location of the landfill is in the bottom of the mined out trench, we suggest that American Gilsonite consider terminating post-closure activities as future maintenance and monitoring are not likely to change the integrity of the cap covering the waste at the bottom of the mined out trench. To terminate post-closure care of the landfill, American Gilsonite would need to obtain certification from a professional engineer registered in Utah that post-closure activities, maintenance and monitoring are no longer necessary at the landfill in accordance with R315-302-3(7)(b) and(c), due to the conditions mentioned above.

If you have any questions, please call Wade Hansen or Doug Taylor at (801) 536-0200.

Sincerely,



Scott T. Anderson, Director
Division of Solid and Hazardous Waste

STA/DT/kk

Enclosure(s)

195 North 1950 West • Salt Lake City, UT
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DSHW-2013-003959

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- c: Dean Richens, Environmental Manager, American Gilsonite – Bonanza Minesite
 Joseph B. Shaffer, MA, MBA, EHS, Health Officer, Tri-County Health Department
 Darrin Brown, LEHS, Environmental Health Director, Tri-County Health Department
 Scott Hacking, P.E., District Engineer
 Paul Baker, Minerals Manager, Utah Division of Oil, Gas and Mining

SOLID WASTE FACILITY INSPECTION REPORT CHECKLIST

UTAH DIVISION OF SOLID & HAZARDOUS WASTE

Facility Name American Gilsonite - Bonanza Closed Class IIIb Landfill County Unitah
 Location Approximately 2.5 miles north east of the American Gilsonite Facility which is 35 miles south of Vernal, Utah on Highway 45.
 Inspection Date 6/13/2012 Time In 11:00 am Time Out 11:30 am
 Routine Oversight ☒ Follow up ☐ Monitoring Evaluation ☐ Facility Status ☐ Construction Review ☐
 Announced ☒ Unannounced ☐ Weather Conditions Clear, warm and windy
 Inspection Goal To determine the cap of the landfill is intact
 Facility Contact Stuart Green, VP American Gilsonite
 Participants Leah Phillips, American Gilsonite; Ralph Bohn and Doug Taylor, DSHW
 FOLLOW UP INSPECTION NEEDED Yes ☐ No ☒ Recommended Follow Up Date

(X - indicates items reviewed)

1. PRE-INSPECTION REVIEW

<input type="checkbox"/>	1.1 Permit Review
<input type="checkbox"/>	1.2 Annual Report Review
<input type="checkbox"/>	1.3 Previous Inspection Review
<input type="checkbox"/>	1.4 Facility Contacts Confirmed
<input checked="" type="checkbox"/>	1.5 Facility Contacted (if announced inspection)
<input type="checkbox"/>	1.6 Local Health Contacted
<input type="checkbox"/>	1.7 Other

2. FACILITY / OPERATIONAL CONTROLS

<input type="checkbox"/>	2.1 Litter
<input type="checkbox"/>	2.2 Roads
<input type="checkbox"/>	2.3 Gate House Operations
<input type="checkbox"/>	2.4 Vectors
<input type="checkbox"/>	2.5 Communications
<input type="checkbox"/>	2.6 Recycling Area
<input type="checkbox"/>	2.7 Fugitive Dust Control
<input type="checkbox"/>	2.8 Waste Inspection Area
<input type="checkbox"/>	2.9 Scavenging Control
<input type="checkbox"/>	2.10 Open Burning
<input checked="" type="checkbox"/>	2.11 Fences, Gates, Locks, Access Control
	Landfill area is fenced with signs
<input type="checkbox"/>	2.12 Working Face
<input type="checkbox"/>	2.13 Leachate Collection System

<input type="checkbox"/>	2.14 Other
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3. SIGNS REQUIRED / PROPERLY POSTED

<input type="checkbox"/>	3.1 Operating Days / Hrs.
<input type="checkbox"/>	3.2 Directions & Procedure
<input type="checkbox"/>	3.3 Emergency Numbers
<input type="checkbox"/>	3.4 List of Unacceptable Materials
<input type="checkbox"/>	3.5 Other

4. OPERATOR / REPRESENTATIVE / EMPLOYEES

<input type="checkbox"/>	4.1 On-site while open
<input type="checkbox"/>	4.2 Training
<input type="checkbox"/>	4.3 Other

5. MONITORING

<input type="checkbox"/>	5.1 Methane
<input type="checkbox"/>	5.2 Random Inspections
<input type="checkbox"/>	5.3 Leachate
<input type="checkbox"/>	5.4 Ground Water
<input type="checkbox"/>	5.5 Other

6. DRAINAGE / EROSION

<input type="checkbox"/>	6.1 Water Run-on
<input type="checkbox"/>	6.2 Water Run-off

SOLID WASTE FACILITY INSPECTION REPORT

Date: 6/13/2012

Facility Name: American Gilsonite - Bonanza Closed Class IIIb Landfill

<input type="checkbox"/>	6.3 Other
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7. PROPER STORAGE / ISOLATION / DISPOSAL

<input type="checkbox"/>	7.1 Special Waste
<input type="checkbox"/>	7.2 Batteries
<input type="checkbox"/>	7.3 Hazardous Waste
<input type="checkbox"/>	7.4 Infectious Waste
<input type="checkbox"/>	7.5 Tires
<input type="checkbox"/>	7.6 Dead Animals
<input type="checkbox"/>	7.7 Asbestos
<input type="checkbox"/>	7.8 Bulky Waste
<input type="checkbox"/>	7.9 Contaminated Soil
<input type="checkbox"/>	7.10 Ash
<input type="checkbox"/>	7.11 Sludge
<input type="checkbox"/>	7.12 Other

8. COVER

<input type="checkbox"/>	8.1 Daily - Soil
<input type="checkbox"/>	8.2 Daily - Alternative
<input type="checkbox"/>	8.3 Intermediate
<input checked="" type="checkbox"/>	8.4 Final Waste has been covered
<input type="checkbox"/>	8.5 Vegetation
<input type="checkbox"/>	8.6 Other

9. INSPECTION RECORDS

<input type="checkbox"/>	9.1 Random Inspection Report
<input type="checkbox"/>	9.2 Gas Monitoring System
<input type="checkbox"/>	9.3 Surface Drainage Control
<input type="checkbox"/>	9.4 Daily Records
<input type="checkbox"/>	9.5 Weight or Volumes
<input type="checkbox"/>	9.6 Intermediate Cover

<input checked="" type="checkbox"/>	9.7 Final Cover Placed on waste at the bottom of the trench
<input type="checkbox"/>	9.8 Self Inspection (Quarterly) Reports
<input type="checkbox"/>	9.9 Deviation from Plans
<input type="checkbox"/>	9.10 Permit, Permit Application and Rules Available
<input type="checkbox"/>	9.11 Other

10. MONITORING / SAMPLING / ANALYSIS RECORDS

<input type="checkbox"/>	10.1 Explosive Gas Monitoring
<input type="checkbox"/>	10.2 Leachate Sampling & Treatment
<input type="checkbox"/>	10.3 Ground Water Sampling Results
<input type="checkbox"/>	10.4 Other

11. SPECIAL WASTE RECORDS

<input type="checkbox"/>	11.1 Lab Analysis Results
<input type="checkbox"/>	11.2 Manifests
<input type="checkbox"/>	11.3 Treatment Certification
<input type="checkbox"/>	11.4 Paint Filter Test Results
<input type="checkbox"/>	11.5 Onsite Treatment Documentation
<input type="checkbox"/>	11.6 Other

12. SPECIAL PERMIT REQUIREMENTS

<input type="checkbox"/>	12.1
<input type="checkbox"/>	12.2
<input type="checkbox"/>	12.3

13. OTHER ITEMS

<input type="checkbox"/>	13.1 Notice of Inspections Form Completed and Signed
<input type="checkbox"/>	13.2
<input type="checkbox"/>	13.3
<input type="checkbox"/>	13.4
<input type="checkbox"/>	13.5

DSHW Inspector Signature: _____

DSHW Inspector Name (type or print): Doug Taylor

Date: 6/13/2013

**American Gilsonite Closed Class IIIb Landfill
Inspection Photos
June 13, 2013**



View west of the reclaimed area adjacent to the landfill in the mined out trench



View south of the landfill



New sagebrush growing on the reclaimed adjacent to the mine trench



View south showing the closed landfill in the mine trench



View northwest of the reclaimed area adjacent to the mine trench



View southeast of the reclaimed area adjacent to the mine trench